

Re: Blinman v Lujan Grisham, et.al. | Extension of Deadlines

Merit Bennett

Mon 9/8/2025 1:03 PM

To: Hope Pendleton <HPendleton@serpeandrews.com>;

Cc: Cody Rogers <crogers@serpeandrews.com>; Corina Marrufo <cmarrufo@serpeandrews.com>; staff <staff@thebennettlawgroup.com>;

Hope,

I apologize for not clarifying the extent of our request. At this time, we are requesting an extension of 90 days to allow new counsel to get up to speed and coordinate with your office to depose the previously identified individuals, including the Defendants, whom I assume you are not currently prepared to produce for deposition within 30 days.

Please advise by close of business today if you will agree to an extension of 90 days for the discovery-related deadlines.

Thanks,

Merit

Merit Bennett

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“Now, we must all fear evil men. But there is another kind of evil which we must fear most, and that is the indifference of good men.”

(Monsignor, character in the 1999 movie *The Boondock Saints*, written and directed by Troy Duffy)

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From: Hope Pendleton <HPendleton@serpeandrews.com>**Sent:** Monday, September 8, 2025 7:02 AM**To:** Merit Bennett**Cc:** Cody Rogers; Corina Marrufo; staff**Subject:** RE: Blinman v Lujan Grisham, et.al. | Extension of Deadlines

Good morning, Merit:

I am sorry to hear that you have been experiencing medical issues. I hope you feel better soon.

In regard to your request, we are fine with a short extension, approximately 30 days, but we are not okay with an indefinite extension of these deadlines.

Thank you and have a great week.

Hope

Hope Pendleton

Associate Attorney



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From: Merit Bennett <mb@thebennettlawgroup.com>

Sent: Friday, September 5, 2025 9:44 AM

To: Hope Pendleton <HPendleton@serpeandrews.com>

Cc: Cody Rogers <crogers@serpeandrews.com>; Corina Marrufo <cmarrufo@serpeandrews.com>; staff <staff@thebennettlawgroup.com>

Subject: Re: Blinman v Lujan Grisham, et.al. | Extension of Deadlines

Cody and Hope,

As a follow-up to my previous email, we will need to file the motion to extend on Monday, so if we do not hear from you by Monday, we will assume that you oppose the motion.

Best,

Merit

Merit Bennett

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On 9/5/2025 7:21 AM, Merit Bennett wrote:

Cody and Hope,

As you may know, I was forced to cancel the deposition of Defendant Teresa Casados due to mold exposure at my office prompting an urgent relocation from the office space. That same exposure has also resulted in serious health-related complications, all of which has significantly disrupted case preparation activities and necessitated the cancellation of the scheduled deposition.

Due to health-related complications arising from mold exposure I am being forced to step back from my practice to focus on my health.

I am in the process of identifying and retaining substitute counsel, but I have not yet secured new representation for Mr. Blinman so that depositions can be conducted.

I would like to move the Court for an extension of the discovery and all current related deadlines.

Please advise regarding your position on the matter.

Thanks,

Merit

Merit Bennett

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